

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
: :
DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)
: :
: (Jointly Administered)
Debtors. :
-----X

RESPONSE OF CLAIMANT, PEERLESS TRANSPORTATION COMPANY TO NOTICE
OF OBJECTION TO CLAIM AS SET FORTH IN DEBTOR'S THIRD OMNIBUS
OBJECTION

Claimant:	Peerless Transportation Company
Claim No.:	10686
Date Claim filed:	July 26, 2006
Asserted Claim Amount:	\$5,000,000.00
Basis for Debtor's Objection:	Unsubstantiated Claim
Debtors' Proposed Treatment of Claim:	Disallow and Expunge.

I. Claimant's Statement As To Why Claim Should Not Be Disallowed

The Peerless Transportation Company ("Peerless") was a trucking company located in Dayton, Ohio. In the mid 1980's, the company hauled waste generated by Delco's facilities in Kettering and Dayton, Ohio. Peerless delivered the Delco waste to some part of the Tremont Landfill. Peerless has documentation showing the date, ticket number, and cubic yards brought to the landfill.

On December 22, 2003, Peerless received a General Notice of Potential Liability from the EPA. Peerless continues to receive notices from the EPA about this site. It is unknown whether the wastes Delco provided to Peerless were hazardous. Peerless, therefore, has considerable financial exposure for the waste Delco provided to Peerless for transport to the Tremont Landfill. The EPA has summoned company representatives to a meeting regarding these issues scheduled for January 17, 2007.

II. Identification Of Documentation Or Other Evidence Upon Which Claimant Will Rely

- a. Several US EPA notices naming Claimant as a Potentially Responsible Party
- b. Voluminous waste tickets evidencing the waste transported by Claimant from Delco to the landfill.

All documents will be made available for inspection at a time convenient to the parties.

III. Amount Claimant Believes Would Be The Allowable Amount Of Such Claim

\$5,000,000.00

IV. Address To Which Debtors Must Deliver Any Reply To This Response

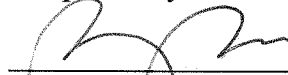
Christopher J. Aluotto, Esq.
Robert F. Brown, Esq.
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One West Fourth Street, Suite 900
Cincinnati, Ohio 45202-3688

V. Person Possessing Ultimate Authority To Reconcile, Settle Or Otherwise Resolve

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Chris Bridges
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Respectfully submitted,



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Attorney for Peerless Transportation Co.
and Mad River Transportation, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2006, I filed a hard-copy and disk format of the Response of Claimant Peerless Transportation Co. with the clerk via Federal Express mail.

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Troy, Michigan 48098
Attn.: General Counsel

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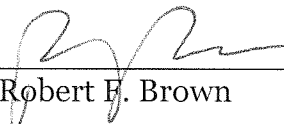
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